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November 29, 2006

VIA HAND DELIVERY

NOV 29 2006

The Honorable Jan E. DuBois
United States District Court for the
Eastern District of Pennsylvania
601 Market Street, Room 12613
Philadelphia, PA 19106

Re: Securities and Exchange Commission v. Liberty, et al., No.
06-1030 (E.D. Pa.)

FILED

MAY 17 2007

MICHAEL E. KUNZ, Clerk
By MAE Dep. Clerk

Dear Judge DuBois:

Pursuant to the Court's November 6, 2006 Order in this matter, enclosed please find the parties' Joint Report Concerning Limitations on Discovery.

As Your Honor will see, the parties agree that the ten-deposition limit contained in Rule 30(a)(2)(A) should not apply in this case. The parties' Initial Disclosures identified nearly ninety unique individuals or entities which are likely to have discoverable information that the parties may use to support their claims or defenses; more such individuals may yet be identified once third-party discovery commences. In light of this volume, the parties believe the ten-deposition limit would hopelessly straightjacket the discovery process.

Further, the parties also agree that the one seven-hour day limit of Rule 30(d)(2) should be increased to two seven-hour days. While, as reflected in the Joint Report, the deposing party shall make all reasonable efforts to ensure that depositions of third-party witnesses are completed in one day, we believe that, given the wide scope of this matter, the seven-hour limitation may prove unduly restrictive, especially as to certain third-parties.

Finally, the parties agree that no increase from the twenty-five interrogatories allowed by Rule 33(a) is necessary at this time.

Should you have any questions concerning this letter or the Joint Report, please do not hesitate to contact me.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brian J. Slipakoff', with a long horizontal flourish extending to the right.

Brian J. Slipakoff
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

Enclosure

cc: Kingdon Kase, Esquire (via first-class mail and enclosure)
Jay A. Dubow (with enclosure)